

234283

John R. McCravy, III  
Board Certified  
National Board of Trial Advocacy



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December 27, 2011

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Dr., Suite 100  
Columbia, SC 29210

Randall Dong  
Hearing Examiner  
Public Service Commission of South Carolina  
101 Executive Center Dr., Suite 100  
Columbia, SC 29210

**RE: BHC Trucking v. Duke Energy Carolinas, LLC**  
**Docket No. 2011-482-E**

Dear Sir and Madam:

Pursuant to Regulation 103-834, the Complainant requests permission to take depositions of Defendant's designee(s) pursuant to Rule 30(b)(6), SCRCP as specified below. The Complainant needs to be able to discover crucial facts about the meters and/or devices in question from a first hand, knowledgeable source.

*We request that the Defendant's designate a person or persons to testify with first hand information concerning the removal and testing of the subject meter and other devices attached to Complainant's premises by the Defendant as well as the testing of any other relevant devices related to this matter. Complainant also desires to depose the Defendant with regard to the engineering and functioning of said devices.*

Respectfully Submitted,

McCRAVY, NEWLON & STURKIE LAW FIRM, P.A.

John R. McCravy, III

JRM/jcf  
Enclosures

cc: BHC Trucking  
Shannon Bowyer Hudson, -SC ORS  
Bonnie D. Shealy - Duke Energy

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